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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SAMSUNG ELECTRONICS CO., LTD.

Plaintiff,

v.

BROADCOM INC., BROADCOM  
CORPORATION, AND AVAGO  
TECHNOLOGIES INTERNATIONAL  
SALES PTE. LIMITED,

Defendants.

CASE NO. 3:24-cv-03959-LB

**[PROPOSED] ORDER GRANTING  
BROADCOM, INC.'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
ITS MOTION TO DISMISS**

Pending before the Court is Defendants Broadcom, Inc., Broadcom Corporation and Avago Technologies International Sales Pte. Limited (“Broadcom”) Administrative Motion to File Under Seal Portions of Its Motion to Dismiss.

Having considered Defendants’ Broadcom Motion to Dismiss and the supporting Declaration of Philip Blum (“Blum Declaration”), and finding that there is good cause to justify sealing the below referenced material, **IT IS HEREBY ORDERED THAT** Defendants’ Administrative Motion is **GRANTED**.

The following portions of Defendants Motion to Dismiss and the Blum Declaration exhibits shall be sealed:

Document	Portion(s) to Seal	Reason for Sealing
Broadcom’s Motion to Dismiss Plaintiff’s Complaint	Highlighted portions at 1:5, 5:8–9, 5:23–25, 5:26, 5:27, 5:28, 6:1, 6:2–3, 6:4–5, 6:8–11, 6:13–23, 6:24, 14:28, 15:1–2, 16:9–12, 18:24–28, 19:1–4, 23:8–13, 23:14–15.	79-5(c). The selected information contains language related to Broadcom's financial commitments, investment details, and specific terms of the Strategic Agreement with Samsung that, if publicly disclosed, risks competitive harm to Broadcom. The selected information also contains language related to the specifics of the Termination Agreement, including the termination date and non-enforcement of the remaining balance, that, if publicly disclosed, risks competitive harm to Broadcom. The portions Broadcom seeks to seal have been narrowly selected and will not prevent Samsung from pursuing their claims in this case. Accordingly, there is no less restrictive alternative.
Strategic	Entirety	79-5(c). The selected information contains language

Agreement		related to Broadcom's financial commitments, investment details, and specific terms of the Strategic Agreement with Samsung that, if publicly disclosed, risks competitive harm to Broadcom.
Termination Agreement	Entirety	79-5(c). The selected information contains language related to the specifics of the Termination Agreement, including the termination date and non-enforcement of the remaining balance, that, if publicly disclosed, risks competitive harm to Broadcom

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024,

\_\_\_\_\_  
THE HONORABLE LAUREL BEELER  
United States Magistrate Judge